

Brown, Katherine

From: Brown, Katherine
Sent: Tuesday, August 13, 2013 10:29 AM
To: Fordham, Tami; Shaw, Hanh
Cc: Godsey, Cindi
Subject: RE: Briefing Papers . . . & other materials that may be helpful in creating the briefing package for the Cook Inlet GP G2G Meetings

Forgot a few added here below.

From: Brown, Katherine
Sent: Tuesday, August 13, 2013 10:20 AM
To: Fordham, Tami; Shaw, Hanh
Cc: Godsey, Cindi
Subject: RE: Briefing Papers . . . & other materials that may be helpful in creating the briefing package for the Cook Inlet GP G2G Meetings

Issues that have come up at the last few meetings...

Group Consultation

DPDES Delegation to AK
NPDES/APDES programs and oversight
consultation methodology and tools
discharges and fish consumption
fish consumption rates in permits
fish consumption rates in state WQS
House Bill 77? expedites permitting process
Best Management Practices
existing production facilities
"Trially oriented" fact sheets specific to tribal interests
facilities that violate permits year after year shouldn't get coverage
tribes should have access to BMPs
tribes should do compliance monitoring
permit should be progressive
mixing zones shouldn't be allowed
address steel rigs and ocean acidification
address global changes like climate change and tsunamis
address natural occurrences in waters changing baseline conditions
stop discharges in emergencies
inspections for invasive species on rigs
why zero discharge requests in past got nowhere
Ocean Discharge Criteria Evaluation not available
cumulative effects should be considered
update dispersion model - include wave action, temperatures, rise in storms and tsunamis
training on EPA's NPDES Permit process
provide mechanism for consultation on oversight

Permitting 101 Training

EPA's Effluent Limitation Guidelines

zero discharge exemption for Cook Inlet and technology based effluent limitations
AK State Water Quality Standards and water quality based effluent limitations
Ocean Discharge Criteria Evaluation yet to be released
Biological Evaluation yet to be released
determinations of unreasonable degradation
human health impacts
fish consumption
observations of fish deformities
ESA/Beluga whale considerations
TEK collected before and now
AK's tribal coordination policy
AK permit appeal procedures

Informational Teleconferences

pollutants in discharges should be minimized
EPA survey of chemical contaminants in subsistence foods
metals, pesticides, PCBs, PAHs, and dioxin compounds detected
ATSDR health consultation
effects of the PAHs and of consuming eggs and organs
should remove the no discharge of produced water exemption in the ELGs
should collect new data to evaluate 10 more years of contaminants in subsistence foods
Alaska's antidegradation policy development
Mixing Zones shouldn't be allowed
lack of tribal involvement

share Ocean Discharge Criteria report and ESA Biological Evaluation report promptly
consider and incorporate changes in the Inlet and in endangered species since the last permit
consider and incorporate fish consumption, including EPA's 2003 and Seldovia's 2012 data
consider and incorporate results of contaminant monitoring conducted since 2007
consider tribal fish consumption and the impacts of cuttings and fluids discharges carefully
consider combined/ cumulative impacts of all discharges on tribal health
include sensitive areas (Port Graham and Nanwalek) from Coastal Zone Management Plan as areas meriting special attention
have another informational call after the draft permit is noticed
extend consultation period given American and traditional holidays that run through January
have a joint EPA-tribal meeting and/or consultation at the Alaska Forum on the Environment

From: Fordham, Tami
Sent: Friday, August 09, 2013 4:07 PM
To: Shaw, Hanh
Cc: Godsey, Cindi; Brown, Katherine
Subject: Briefing Papers . . . & other materials that may be helpful in creating the briefing package for the Cook Inlet GP G2G Meetings

Hi Hanh,

These are briefing papers that were developed for the Tribal Nations White House meeting last November. Much of the information is still relevant, in particular the "other" concerns that might come up. Cindi and/or Katherine may have more recent updates that they have in their files. The other attachment is the notes to file document that we developed